

Kevin A. Lake, Esquire (VSB#34286)
VANDEVENTER BLACK LLP
Eighth & Main Building
707 E. Main Street, Suite 1700
P.O. Box 1558
Richmond, VA 23218-1558
Tel: 804.237.8811
Fax: 804.237.8801
klake@vanblk.com

WILLIAM H. COLLIER, JR., CASB No. 97491
william.collier@kyl.com
DAVID D. PIPER, CASB No. 179889
david.piper@kyl.com
JAMES A. MARISSEN, CASB No. 257699
james.marissen@kyl.com
KEESAL, YOUNG & LOGAN
A Professional Corporation
400 Oceangate, P.O. Box 1730
Long Beach, California 90801-1730
Telephone: (562) 436-2000
Facsimile: (562) 436-7416

Attorneys for Creditor
MADCOW INTERNATIONAL GROUP LIMITED

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

In re:)	Case No. 08-35653-KRH
)	
CIRCUIT CITY STORES, INC., et al.)	Chapter 11 (jointly administered)
)	
Debtors.)	NOTICE OF MOTION AND HEARING FOR
)	MOTION FOR ALLOWANCE AND
)	PAYMENT OF ADMINISTRATIVE
)	EXPENSE CLAIM
)	
)	[Filed concurrently with Motion for Allowance
)	and Payment of Administrative Expense
)	Claim and Declaration of David Wu]
)	
)	Date: January 14, 2010
)	Time: 2:00 p.m.
)	Place: United States Bankruptcy Court,
)	Room 5000, 701 East Broad
)	Street, Richmond, Virginia 23219

1 **PLEASE TAKE NOTICE THAT MADCOW INTERNATIONAL GROUP**
2 LTD. ("Creditor"), by and through its counsel, has filed with the Court a Motion for
3 Allowance and Payment of Administrative Expense Claim, a copy of which has been
4 forwarded to you.

5 **Your rights may be affected.** **You should read these papers**
6 **carefully and discuss them with your attorney, if you have one in these**
7 **bankruptcy cases. (If you do not have an attorney, you may wish to consult**
8 **one.)** Under Local Bankruptcy Rule 400-(a), the Court may deem any opposition
9 waived, treat the Motion as conceded, and issue an order granting the requested relief
10 without further notice or hearing. If you do not want the Court to approve the Motion,
11 or if you want the Court to consider your views on the Motion, then you or your attorney
12 must:

13 [X] File with the Court, at the address shown below, a written objection.
14 If you mail your response to the Court for filing, you must mail it early enough so the
15 Court will **receive** it on or before **January 7, 2010**.

16 Clerk of Court
17 United States Bankruptcy Court
18 701 East Broad Street, Suite 4000
19 Richmond, Virginia 23219

20 [X] You must also deliver a copy to all parties on the Certificate of
21 Service below and to:

22 Douglas M. Foley, Esq.
23 **McGuire Woods, LLP**
24 One James Center
25 901 East Cary Street
26 Richmond, Virginia 23219
27 *Counsel for the Debtors*

22 Greg M. Galardi, Esq.
23 Ian S. Fredericks, Esq.
24 **Skadden, Arps, Slate, Meagher &**
25 **Flom, LLP**
26 One Rodney Square
27 P.O. Box 636
28 Wilmington, Delaware 19899-0636
 Counsel for the Debtors

<p>Dion W. Hayes, Esq. Joseph S. Sheerin, Esq. Sara Becket Boehm, Esq. McGuire Woods LLP One James Center 901 East Cary Street Richmond, Virginia 23219</p> <p><i>Counsel for the Debtors</i></p>	<p>Chris L. Dickerson, Esq. Skadden, Arps, Slate, Meagher & Flom, LLP 333 West Wacker Drive Chicago, Illinois 60606</p> <p><i>Counsel for the Debtors</i></p>
<p>Lynn L. Tavenner, Esq. Paula S. Beran, Esq. Tavenner & Beran, P.C. 20 North Eights Street, 2nd Floor Richmond, Virginia 23219</p> <p><i>Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>Jeffrey N. Poemrantz, Esq. Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Boulevard, 11th Floor Los Angeles, California 90067-4100</p> <p><i>Counsel for the Official Committee of Unsecured Creditors</i></p>
<p>Robert J. Feinstein, Esq. Pachulski Stang Ziehl & Jones LLP 780 Third Avenue, 36th Floor New York, New York 10017-2024</p> <p><i>Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>Robert B. Van Arsdale, Esq. Office of the U.S. Trustee 701 East Broad Street, Suite 4304 Richmond, Virginia</p>

[X] Attend a hearing before the Honorable Kevin Huennekens, United States Bankruptcy Judge, scheduled for January 14, 2010 @ 2:00 p.m. at the United States Bankruptcy Court, Room 5000, 701 East Broad Street, Richmond, Virginia 23219.

If you or your attorney do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the relief requested without further notice or hearing.

Dated December 9, 2009

MADCOW INTERNATIONAL GROUP LIMITED

/s/ Kevin A. Lake

Kevin A. Lake

VANDEVENTER BLACK LLP

Eighth & Main Building

707 E. Main Street, Suite 1700

P.O. Box 1558

Richmond, VA 23218-1558

Tel: 804.237.8811

Fax: 804.237.8801

klake@vanblk.com

1 WILLIAM H. COLLIER, JR., CASB No. 97491
2 william.collier@kyl.com
3 DAVID D. PIPER, CASB No. 179889
4 david.piper@kyl.com
5 JAMES A. MARISSSEN, CASB No. 257699
6 james.marissen@kyl.com
7 Keesal, Young & Logan
8 A Professional Corporation
9 400 Oceangate, P.O. Box 1730
10 Long Beach, California 90801-1730
11 Telephone: (562) 436-2000
12 Facsimile: (562) 436-7416

Attorneys for Creditor

11 **CERTIFICATE OF SERVICE**

13 I hereby certify that on the 9th day of December, 2009, I caused to be served a true and correct copy of
14 Madcow International Group Limited's NOTICE OF MOTION AND HEARING FOR MOTION
15 FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM to all parties
receiving notice via ECF and via ECF and/or email on the following:

16 Gregg M. Galardi, Esq.
17 Ian S. Fredericks, Esq.
18 Skadden, Arps, Slate, Meagher & Flom, LLP
19 P.O. Box 636
20 Wilmington, Delaware 19899-0636
gregg.galardi@skadden.com
Ian.Fredericks@skadden.com

22 Chris L. Dickerson, Esq.
23 Skadden, Arps, Slate, Meagher & Flom, LLP
24 155 North Wacker Drive
25 Chicago, Illinois 60606-7120
chris.dickerson@skadden.com

26
27 Douglas M. Foley
28 Dion W. Hayes
McGuireWoods, LLP
One James Center

1 901 E. Cary Street
2 Richmond, Virginia 23219
3 Attorneys for Debtors
4 *dfoley@mcguirewoods.com*
5 *dhayes@mcguirewoods.com*
6

7 /s/ Kevin A. Lake
8 Kevin A. Lake
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28